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LOWELL BEATH

October 7, 1989

Mr. Donald A. Ostler, P.E. Director Bureau of Water Pollution Control Utah Department of Health P.O. Box 16690 Salt Lake City, Utah 84116-0690

DIVISION OF OIL, GAS & MINING

Dear Mr. Ostler:

Subject: Saddle Dam Issue

Barrick is in receipt of your correspondence dated August 2, 1989 which was delivered to the Mercur Mine on August 10, 1989. We continue to share the Bureau's concern that the saddle dam issue be promptly remedied. The corrective measures implemented by Barrick to date show the situation has been essentially mitigated. As agreed at our August 24, 1989 meeting in Salt Lake City, Barrick will install subsurface monitoring to evaluate any downgradient impact.

The "Findings" section of your August 2, 1989 letter has been reviewed and generally agrees with the information submitted by Barrick to the Bureau. There are, however, a few items which we believe need clarification:

BWPC 4(q): We believe the manner in which the data is presented is somewhat misleading. It should be clearly noted that these are selected data points from a total of six samples obtained for total water chemistry. Also, an evaluation as to a pattern of exceedances, or at a minimum a range of data, should have been completed and presented. This is particularly applicable for both cadmium and lead, where only one (1) exceedance was noted out of five (5) Barrick samples analyzed. Perhaps more importantly, the Bureau should have clearly stated the data in question was not obtained from a drinking water source, and the reference to primary drinking water standards is for comparative reference only.

BWPC 4(h): No justification exists in the data to characterize the saddle dam seepage flow point of origin as the tailings impoundment. It is our continued position that the saddle seepage solution is a commingled stream of reclaim pond infiltration and native subsurface waters experiencing substantial cyanide attenuation/ degradation prior to containment in the catchment pond.

BWPC 4(i): All indications are that the Manning Canyon seeps were a result of undetected leakage from the saddle Mr. Donald A. Ostler, P.E. October 7, 1989
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dam catchment pond. Upon containment of the saddle dam seepage solution in a tank (April 1989) and subsequent replacement of the catchment pond liner (June 1989), both Manning Canyon seep areas dried up (July 1989) and remain dry as of this date.

We are pleased to supply the information requested in your August 2, 1989 letter in the appendices described below:

Appendix 1: A general description of hydrologic and structural features. A proposed program for subsurface monitoring and additional containment procedures proposed by Barrick.

Appendix 2: A sampling and monitoring plan for Tailings Impoundment Monitoring Wells 1 and 2, Manning Spring, Fairfield Spring, or other applicable water sources existing or developed per Appendix 1 (above). A Quality Assurance/Quality Control program corresponding to that utilized in the Dump Leach Area 2 investigative program. Manning Canyon "North" and "South" seeps are no longer in existence, and therefore the monitoring of these sites is not applicable.

We trust that this information and the subsurface monitoring proposed will allow us to adequately address your concerns. Your continued cooperation is appreciated, and any meetings or site visitations are welcomed. Please contact me should questions concerning this correspondence arise.

Respectfully,

Glenn M. Eurick

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Environmental Affairs Coordinator

GME/cg

Attachments

cc: F. D. Wicks

C. L. Landa

E. E. Maurer

M. P. Richardson

R. R. Sacrison

D. P. Beatty

L. Braxton (DOGM)

M. Trujillo (Tooele County)

D. Bird (Parsons, Behle & Latimer)